UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

OCT 22 1991

Mr. James Kavanaugh
Missouri Department of Natural Resources
P. O. Box 176
Jefferson City, Missouri 65102

Dear Mr. Kavanaugh:

This letter is in response to the inquiry made by the Missouri Department of Health concerning the Record of Decision for the Martha C. Rose Chemical Site. It was my understanding that all of the concerns expressed by the Department of Health had been addressed during our conference call with Randy Maley held on June 17, 1991. I have no further information on the topic but will repeat what I recall was discussed during this conference call.

Mr. Maley stated that he was concerned that no analysis for dioxins or Polychlorinated dibenzofurnas had been made at the Rose Site. I explained that EPA had no indication there had been any burning of PCBs at the Site; therefore, EPA did not believe there was any basis for the assumption that dioxins or furans would be present at the Site. Then, Mr. Maley stated that he had read an article, which said that Polychlorinated dibenzofurans contaminated all PCBs even without the PCBs being exposed to open burning. He did not have any supporting information and was unable to give specific detail concerning the article, its source or the credentials of the authors. I was unable to gain sufficient detail, concerning the contents of the article from Mr. Maley other than, he had read an article and thought we should have tested for furans based on his understanding of the contents.

Mr. Maley stated that he recalled from the article that PCBs at a level between 100 and 1,000 ppm could be contaminated with as high as one to two ppb furans. I explained, even if this were the case, the highest concentration of PCBs to be left at the Site will be less than 10 ppm. Assuming a straight line correlation the furan concentration at that level would be no more than 0.1 to 0.2 ppb in the material remaining at the Site. I further stated that, based on my recollection, dioxin equivalents for isomers of dioxin and furans, compared to 2,3,7,8 TCDD, were no greater than 0.1 for furans and some as little as 0.001. Taking the most conservative figure of 0.1 and applying

it to the Rose Site, the greatest risk one could expect to find as a result of the furans, which may contaminate the remaining PCBs at the Site, would be the equivalent of 0.01 ppb 2,3,7,8 TCDD or 100 times less that the action level for nonrestricted residential use. With this explanation provided, Mr. Maley agreed that he saw no potential of significant risk to human health or the environment, resulting from the alleged potential for furan-contamination of the PCBs that will remain at the Site.

There has been no further information received by the EPA to contradict the information conveyed in the June 17, 1991 conference call. Therefore we do not plan to expend the additional effort, time and cost required to investigate for furans at this site.

I hope this information is sufficient to address the Department of Health's concerns. Please feel free to contact me (913 551-7728) concerning this matter if additional information is required.

Sincerely yours,

Steven E. Kinser

Steven Kinser
Remedial Project Manager
Removal Enforcement Section
Superfund Branch
Waste Management Division